

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

DONNA LANGAN,	§	
TERESA DE BARBARAC, and	§	
ALEXANDRA CARSON	§	
Plaintiffs,	§	
	§	Cause No. 1:20-cv-275
v.	§	
	§	
GREG ABBOTT, in his Official Capacity as	§	
Governor of Texas; and	§	
KEN PAXTON, in his Official Capacity as	§	
Attorney General of Texas	§	
Defendants.	§	

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE  
AMENDED COMPLAINT**

TO THE HONORABLE U.S. DISTRICT COURT JUDGE:

Plaintiffs respectfully requests leave pursuant to Rule 15 of the Federal Rules of Civil Procedure to file an Amended Complaint for the reasons below. The proposed Amended Complaint is attached as Exhibit A. Defendants are not opposed to this motion.

Granting Plaintiff leave to amend the complaint will not prejudice any of the Defendants or delay proceedings. Discovery will not be delayed.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant Plaintiffs leave to file an Amended Complaint.

Dated: June 5, 2020

Respectfully submitted,

/s/ Brian McGiverin  
Brian McGiverin  
Texas Bar No. 24067760  
brian@austincommunitylawcenter.org  
AUSTIN COMMUNITY LAW CENTER  
1411 West Ave, Ste. 104  
Austin, TX 78701  
Telephone: (512) 596-0226  
Fax: (512) 597-0805

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on all counsel of record who have appeared in this matter through the Electronic Case Files System of the Western District of Texas.

/s/ Brian McGiverin  
Brian McGiverin

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Defendants, and they are not opposed to this motion.

/s/ Brian McGiverin  
Brian McGiverin